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March 11, 2022

Honorable Stewart D. Aron
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl St.
New York, New York 10007

Re: U.S. ex rel. Donohue v. Carranza, et. al.
1:20-CV-5396 (GHW)(SDA)

Dear Magistrate Judge Aaron,

This firm represents the Stamford Board of Education ("Stamford") and its superintendent, Dr. Tamu Lucero ("Dr. Lucero"). Pursuant to Rules I.A and I.D of this Court's Individual Practices, please accept this correspondence as a request for an extension of time up to and including April 15, 2022, for Stamford and Dr. Lucero to respond to the plaintiff-relator's Second Amended Complaint (Doc. 19). There have been no prior requests for an extension of time and there is no presently set deadline for the Board or Dr. Lucero's response. The reason for the request is to allow the undersigned counsel to evaluate the Second Amended Complaint and to address whether service was proper in this matter and, the ability of the plaintiff and this Court to exercise jurisdiction over a school district in the State of Connecticut. By making this request, neither Stamford nor Dr. Lucero submit to jurisdiction or waive any arguments against jurisdiction. The undersigned contacted Attorney Rory Bellantoni on behalf of the plaintiff-relator by phone and email to obtain his consent to this request but has not yet received a response.

Respectfully submitted,


Ryan P. Driscoll

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